



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PWB
F. #2014R01413

271 Cadman Plaza East
Brooklyn, New York 11201

February 11, 2016

By Hand Delivery and ECF

Lee A. Ginsberg, Esq.
Freeman, Nooter & Ginsberg
75 Maiden Lane, Suite 503
New York, New York 10038

Re: United States v. Akmal Zakirov
Criminal Docket No. 15-95 (WFK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes additional discovery with respect to the above-referenced case. The enclosed discovery is being produced pursuant to the Stipulations and Protective Orders entered by the Court with respect to each defendant. Enclosed is a hard drive containing forensic copies of digital devices recovered from your client. The password to allow you to access the materials on the hard drive will be provided under separate cover. Any additional discovery will be provided to you as it becomes available. The government hereby requests reciprocal discovery. If you have any questions, please do not hesitate to contact me.

Very truly yours,

ROBERT L. CAPERS
Acting United States Attorney

By: /s/ Peter W. Baldwin
Peter W. Baldwin
Alexander A. Solomon
Douglas M. Pravda
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (WFK) (by ECF) (without enclosures)